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**Subject:** Risk Mitigation Decision on Rodenticides  
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Rusty:

This is a follow-up to the voice message I just left for you. We spoke last year about what was happening with the new rodenticide rules and you provided me with several excellent slides I have used in training workshops on vector control and IPM that I have done around the country. I am scheduled to give a presentation on rodent control at the National Environmental Health Association's Annual Conference in July and I would like to make sure that the information I am presenting is still accurate.

If you could take a look at the slides below and tell me if they need to be modified in any way, I would greatly appreciate it. Also, if you have more updated slides that you would consider allowing me to use, that would be extremely helpful.

Thanks in advance for any help you can give me. Feel free to call or e-mail me if you have questions or need more information.

Mike

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## EPA Risk Mitigation Decision for Ten Rodenticides

May 28, 2008, updated March 2012

- To minimize children's exposure to rodenticide products used in the home\*, residential and general consumers are restricted as follows –
  - rodenticide baits only sold in bait stations
  - loose baits (pellets and meal) banned for sale
- To reduce wildlife exposure and ecological risks -
  - Limits for general public on 4 of the 10 rodenticides of greatest risk to wildlife (brodifacoum, bromodiolone, difenacoum, and difethialone).
  - Bait stations required for all outdoor, above ground uses.

\* (12,000 – 15,000 exposures/year in children under age 6)

<http://www.epa.gov/oppsrrd1/reregistration/rodenticides/>

### Risk Mitigation - Ecological

- Risk Identified:
  - direct and secondary poisonings of non-target species
  - well documented 2<sup>nd</sup> gen. anticoagulant present in livers of raptors, foxes, wild cats, deer
- Mitigation Required:
  - reduce availability of 2<sup>nd</sup> gen. anticoagulants to homeowners
  - prohibit sale of 2<sup>nd</sup> gen. products in retail stores
  - packaging size requirements for 2<sup>nd</sup> gen. products
    - 8 lbs for agriculture products/ 16 lbs for professionals (PCOs)
  - outdoor (non-field) use must be within 50 ft. of buildings
  - bait stations required for some professional applications



Building = roof + walls on all sides



### Not Buildings

- Fences
- Oil Depositories
- Playground Structures
- Dumpsters
- Picnic Shelters
  - w/o enclosed space like bathroom.

